

IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

)

)

v.

)

Case No. 1:23-mj-90

KHOSROV SHAPOORIAN,

)

)

)

Defendant.

)

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Officer Trent Marchi, being duly sworn, state the following:

1. I entered on duty with the Security Protective Service (“SPS”) of the Central Intelligence Agency (“CIA”) in June 2022. Prior to my services with SPS, I served as a police officer with Winchester Police Department from November 2018 to March 2022.

2. This affidavit is submitted in support of a criminal complaint charging KHOSROV SHAPOORIAN with criminal trespass at the George Bush Center for Intelligence in McLean, Virginia (“CIA Headquarters”), in violation of 32 C.F.R. § 1903.7(a), which prohibits entering or remaining on any CIA installation without proper authorization.

3. The facts and information contained in this affidavit are based upon my personal knowledge and observations during the course of this investigation, information conveyed to me by other individuals, including law enforcement officers, and my review of records, documents, and other physical evidence obtained during the investigation. This affidavit contains information

necessary to support probable cause, and it is not intended to include each and every fact and matter observed by me or known to the government.

4. On Friday, April 21, 2023 at approximately 2:00 a.m., security monitors at CIA Headquarters in McLean, Virginia, within the Eastern District of Virginia, showed a vehicle approach the facility. The driver of the vehicle approached the main gate of CIA Headquarters, stopping in a slip lane of Route 123, which is located within the CIA's property. The driver was later identified by his Virginia driver's license as the defendant, KHOSROV SHAPOORIAN. Upon approach to the main entrance of CIA Headquarters, the defendant passed two warning signs which read in relevant part:

WARNING

RESTRICTED

U.S. GOVERNMENT

INSTALLATION

EMPLOYEES AND OFFICIAL

VISITORS ONLY

IT IS UNLAWFUL TO ENTER

OR ATTEMPT TO ENTER

THIS INSTALLATION WITHOUT

PROPER AUTHORIZATION

32 C.F.R. 1903

5. The defendant stopped his vehicle and put on his flasher. When I approached the vehicle, I immediately recognized the defendant and his vehicle from prior incidents at CIA Headquarters, including one incident on April 16, 2023. After I pulled up and exited my vehicle,

the defendant proceeded to put his vehicle in reverse and accelerate quickly. He hit and drove over the curb with his vehicle. The defendant then put the vehicle in park, and I approached the vehicle. The defendant opened the vehicle and proceeded to yell in my direction that he had been at the CIA 12 times before, and no one had listened to or helped him. I told the defendant that he knows he is not supposed to be at CIA; the defendant stated that he needs to speak with someone regarding the Iranian people.

6. I am aware that the defendant has trespassed at CIA Headquarters on five prior occasions, each of which resulted in either a warning or citation: January 2, 2019 (citation); November 20, 2022 (verbal warning); November 21, 2022 (written warning); November 22, 2022 (citation); and April 16, 2023 (written warning). Records from those incidents note that the defendant expressed similar concerns regarding needing help from the CIA, and that officers have repeatedly told the defendant that he was not allowed to return. I personally encountered the defendant on April 16, 2023, at CIA Headquarters, at which time I issued the defendant with a written warning after the defendant began yelling and would not communicate clearly with myself and other officers.

7. Based on the foregoing, I submit there is probable cause to believe that on or about April 21, 2023, within the Eastern District of Virginia, KHOSROV SHAPOORIAN did enter or remain on a CIA installation without authorization, in violation of 32 C.F.R. § 1903.7(a).



Officer Trent Marchi  
Security Protective Service  
Central Intelligence Agency

Subscribed and sworn to before me  
This 21st day of April 2023.

*William E. Fitzpatrick*  
The Honorable William E. Fitzpatrick  
United States Magistrate Judge  
Alexandria, Virginia